

Aventis CropScience



March 28, 2002

456449-00

Ms. Joanne Miller
Product Manager 23
Document Processing Desk - AMEND
Office of Pesticide Programs (7505C)
Crystal Mall Building 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Subject: Rely® Herbicide, EPA Reg. No. 264-652
Application to Amend the Registration to Provide New Use Directions
Reduction of the Plant-Back Interval Following Use of Rely® Herbicide for
Potato Vine Desiccation.

Dear Ms. Miller:

Enclose with this cover, please find an application to amend the registration of Rely® Herbicide to provide new product labeling.

Currently, the directions for use of Rely as a potato vine desiccant require that wheat, barley, oats, and other small grain cereal crops must not be planted until 70 days or more after application in an area treated with Rely. This restriction prevents the use of this product in a substantial portion of the vine desiccation market; i.e. that segment in which a rotation to an over-wintering small grain crop (e.g., winter wheat) is a common practice. In this segment, growers continue to use sulfuric acid and paraquat for vine desiccation, products that have worker-safety and ecological concerns. The ability to use Rely Herbicide in this segment of the potato market provides growers an alternative vine desiccant without such issues.

Aventis CropScience has conducted a limited field rotational crop study that demonstrates no residues above the limit of quantitation (LOQ) of the analytical method were detected in wheat raw agricultural commodities when planted approximately 30 days after application of Rely® Herbicide to potatoes. Three trials were conducted in major potato growing regions where rotation to wheat following the harvest is common. The application rate was slightly above the maximum allowed by the product label. The results are found in the following table. Consequently, the product label enclosed with this application proposes to establish the interval between the time of application to the time a small grain crop can be planted at 30 days or more.

Table 1: Results of Rotational Crop Study Following Potato Vine Desiccation with Rely

Site	Total Residues (ppm) ^a			
	Wheat Forage	Wheat Hay	Wheat Straw	Wheat Grain
Leigh County, PA	Not Detected	Not Detected	Not Detected	Not Detected
Jermone County, ID	<0.05	<0.05	Not Detected	Not Detected
Grant County, WA	Not Detected	Not Detected	Not Detected	Not Detected

a. Total residue (sum of glufosinate and 3-MPP) values reported in free acid equivalents. MDL of the analytical method = 0.015 ppm, LOQ = 0.05 ppm.

Enclosed with this cover please find the following items:

- Completed Application for Pesticide Registration (EPA Form 8570-1).
- Five copies of the proposed Rely Herbicide Label. One copy of the label in which the proposed change is found in yellow highlight is also enclosed to facilitate the review process.
- Three copies of the study being submitted in support of this application to reduce the plant back interval for small grains following use of Rely Herbicide for potato vine desiccation. (Document 2 of 2)
- Three copies of the Transmittal Document (Document 1 of 2).
- Certification with Respect to Citation of Data (EPA Form 8570-34).
- Data Matrix for Internal EPA use (EPA Form 8570-35).
- A blackened copy of the Data Matrix Form for public use.

Please contact me if you have questions regarding this registration amendment applicaiton or require additional information.

Sincerely,



Paul A. Cain, Ph. D
Registration Manager

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Aventis CropScience



TRANSMITTAL DOCUMENT

Document 1 of 2

**Data in Support of an Application to Amend the Registration of
Rely® Herbicide for Use in Potato Vine Desiccation**

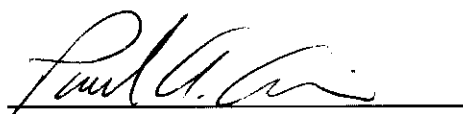
IN SUPPORT OF

Rely® Herbicide, EPA Reg. No. 264-652

TRANSMITTAL DATE

March 28, 2002

Company Official:

A handwritten signature in black ink, appearing to read "Paul A. Cain", written over a horizontal line.

(signature)

Company Name:

Aventis CropScience USA LP

Company Contact:

Paul A. Cain

Telephone:

(919) 549-2582

Aventis CropScience
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BIBLIOGRAPHY OF SUBMITTED STUDIES

Product (EPA Reg. No.): Rely® Herbicide (264-652)
Purpose of Submission: Application to Amend Registration of Rely Herbicide for Use in Potato Vine Desiccation
Date of Submission March 28, 2002

Doc. Number	Study Reference	Study Number	EPA Study Number	EPA MRL Number
1 of 2	Transmittal Document	NA	NA	NA
2 of 2	Wyatt, D.R., 2002. At Harvest Glufosinate-Ammonium Derived Residues in Rotated Wheat Planted after Treatment of a Potato Crop with Rely® Herbicide at the Maximum Proposed Rate and Minimum Proposed Rotational Interval, USA, 2000; Aventis CropScience; Study Number 00BK27920; March 26, 2002; 118 pages.	B003783	860.1500	45644901

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